REMARKS

Claims 9-20 are pending in the above-captioned patent application. Claims 9-14, 16, 18 and 19 were rejected under 35 USC 103(a) as being unpatentable over USPN 5,956,487 to Venkatraman et al. (Venkatraman) in view of USPN 6,148,346 to Hansen. Claims 15 and 17 were rejected under 35 USC 103(a) as being unpatentable over Venkatraman and Hansen and further in view of USPN 5,938,726 to Reber et al. (Reber). Claim 20 was objected to as being dependent on a rejected base claim, but deemed allowable if rewritten in independent form including limitations of the base claims and any intervening claims. Applicant wishes to thank the Examiner for detailing the allowable claim. Claim 20 has been rewritten in independent form, including limitations of the base claim and intervening claims, and should therefore be allowed. Independent Claim 9 has been amended to further clarify the claimed limitations.

Rejection of Claims 9-14, 16, 18 and 19 under 35 USC §103(a)

Rejection of Claims 9-14, 16 and 18 under §103(a) as being unpatentable over Venkatraman in view of Hanson is respectfully traversed because the claims include limitations not taught or suggested by the cited references alone, or in combination.

Venkatraman is directed to a system wherein Web access functionality is embedded in a device to enable accessible user interface functions for the device. A web server in the device provides access to the user interface functions for that device through a device web page. A network interface in the device enables access to the web page by a web browser such that a user

of the web browser accesses the user interface functions for the device through the web page. (Abstract).

Hanson is directed to a data communication system for allowing communication between various devices and various operating systems across various types of networking systems. The data communication system includes a host computer system 10 with a display device 15 and a processor 17 for generating signals for the display device, at least one peripheral device 56, and a dynamic device driver 42 for allowing two-way communication between the peripheral device and the host computer system. The dynamic device driver includes an operating system specific portion 33, configured for the operating system of the host computer system, and an operating system independent device driver portion 34, configured for the peripheral device. The operating system includes a linking mechanism 19 for allowing two-way communication between the operating system specific portion and the operating system independent device driver portion, thus allowing two-way communication between the processor and the peripheral device. (Abstract).

As per **Claim 9**, Venkatraman (figs. 2, 3, col. 5, lines 29-40, 46-51, relied on by the Examiner) does not disclose: creating a device link page for one or more devices currently connected to the network, as required by Claim 9. Rather, Venkatraman Fig. 2 and col. 5, lines 29-40, 46-51, is directed to a system wherein Web access functionality is embedded in the device 10 to enable accessible user interface functions for the device 10 by a web browser 40. A web server 14 in the device 10 provides access to the user interface functions for that device 10

through a device web page 18. A network interface 12 in the device 10 enables access to the web page 18 (Fig. 3) by the web browser 40 such that a user of the web browser 40 accesses the user interface functions for the device 10 through the web page 18. In Fig. 3, the device 10 is a printer that shows a home page for the printer. Venkatraman does not disclose creating a device link page from at least the local network, as claimed.

The Examiner maintains that the web page 18 is a device link page, as claimed. The web page 18 is not a link page; rather the web page 18 is the actual user interface for the device 10. The claimed link page is for access to the graphical or textual information in a device, rather than the web page 18 of Venkatraman which is the actual user interface of the device 10. Indeed, Venkatraman teaches away from the claimed device link page since Venkatraman provides a web page 18 for a device 10 on a browser 40 that allows a user to interact with the device 10. The web page 18 is not for one or more devices currently connected to the network, as claimed, rather it is the actual user interface of device 10 only.

Venkatraman states that the browser 40 accesses the functions of the one device 10 at a URL provided by a user, and displays such user interface information for the printer device 10 (i.e., printer name, administrator, location, etc.). There is no link page of devices displayed on the browser 40.

Further, as the Examiner also states, Venkatraman does not disclose: "the device link page contains at least a device button that is currently connected to the network," as required by

Claim 9. The Examiner states that Hanson (figs. 3-5, col. 5, lines 25-40) discloses such

limitations. However, the GUI list in Fig. 5 of Hanson is a list of features for printers, provided

to help the user select which printer to use. The list of features include printer emulation,

resolution, print speed, paper and envelope sizes, comments or additional printer features (col. 5,

lines 25-40). Hanson does not disclose a device link page that contains at least a device button

that is currently connected to the network. As both Venkatraman and Hanson fail to teach the

claimed limitations, their combination also fails to teach the claimed limitations.

Further, in Fig. 3, col. 5 lines 36-42 (relied on by the Examiner), Venkatraman states that

a web server 14 in a device 10 generates a web page 18 that defines a set of user interface

functions for the device 10. The web server 14 generates the web page 18 to reflect the updated

state of the information pertaining to the device 10 that is maintained by a monitor 16. The web

page 18 may also define control buttons according to the HTTP protocol that enable various

control functions for the device 10 to be initiated from a web client via a communication path

(Col. 3, lines 16-18, 27-29, 33-40). Further, a browser 40 accesses a user interface function of a

device 10 at a URL provided by a user, and displays such web page 18 (Fig. 3, col. 5, lines 29-

42). Venkatraman's teaching of the web browser 40 accessing and displaying the web page 18

created by the web server 14 in a device 10, does not teach or suggest the claimed limitation of

associating a hyper-text link with each device button or the limitation of the hyper-text link

provides a link to graphical or textual information that is contained in the device that is

associated with the device button, as claimed.

In col. 5, lines 36-42, relied upon by the Patent Office, Venkatraman specifically states: "The web browser 40 includes a display 42 for generating visual objects including text, images, multimedia objects, and graphical user interface objects. The web browser 40 includes a selection device 44 that enables a user to select objects and URL links rendered on the display 42. The web browser 40 may also include an audio capability that enables rendering of audio information to the user" (col. 5, lines 36-42). As such, the links mentioned in Venkatraman are not associated with device buttons in a link page, as claimed. The selection device 44 in Venkatraman simply: "enables a user to select objects and URL links rendered on the display 42". There is no mention that that links in Venkatraman are hyper-text links associated with device button in a network (such as multiple devices 10), wherein each hyper-text link provides a link to graphical or textual information that is contained in the device that is associated with the device button, as claimed. Applicant respectfully requests that the Examiner specifically point out where the claimed limitations are taught or suggested in Venkatraman.

Examiner states that Venkatraman, Fig. 3, teaches display of the device link page on a display, as claimed. However, as detailed above, in Fig. 3, the browser 40 is not displaying a link page or list of devices, rather the web page (i.e., user interface) of the one device 10, which is a printer in the example of Fig. 3. Venkatraman states that the browser 40 accesses the functions of the one device 10 at a URL provided by a user, and displays such user interface information for the printer device 10 (i.e., printer name, administrator, location, etc.). There is no device link page displayed on the browser 40.

Further, each reference itself must suggest a modification or combination proposed in order for the modification or combination to be valid; "[the] invention cannot be found obvious unless there was some explicit teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art must provide one of ordinary skill in the art the motivation to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). There is no suggestion from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant's claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 9, and dependent claims therefrom, because the combination and modification of the references is improper and does not disclose all the limitations of Applicants' claimed invention.

As to **Claims 10-12**, Applicants respectfully assert that since Claims 10-12 incorporate the novel and unobvious limitations of Claim 9, they are therefore allowable for its dependency due to the reasons set forth above in relation to the rejection of Claim 9, as well as for its own novel sub-features.

As to **Claims 13, 14**, as the Examiner also states, Venkatraman does not teach associating/retrieving an associated logical name stored in a device list file, as well as icons. Despite the Examiner's interpretation, neither Venkatraman nor Hanson, alone or in combination, teach or suggest that a device list file includes logical device names, wherein each logical device name is obtained, stored in the device link page, and converted to a device button, as claimed. By contrast, as discussed above, the GUI list in Fig. 5 of Hanson relied upon by the Patent Office, is nothing more than a list of features for printers, provided to help the user select which printer to use. The list of features include printer emulation, resolution, print speed, paper and envelope sizes, comments or additional printer features (col. 5, lines 36-40). These are not device buttons as claimed. Venkatraman and Hanson do not disclose retrieving a logical device name from a device link file, storing the logical device name in the device link page, converting the logical device name to a device button, as claimed. Venkatraman and Hanson do not disclose retrieving a device ICON image from a home device, creating a device button based on the device ICON image, storing the device button in the device link page, as claimed.

Further, as set forth in greater detail above, the reference itself must suggest the modification or combination proposed in order for the modification or combination to be valid. There is no suggestion or motivation from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant's claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claims 13-14 because the combination and modification of the references is improper and does not disclose all the limitations of Applicants' claimed invention and because the rejection thereof does not comply with the requirements set forth in the MPEP.

As to **Claim 16,** Venkatraman (col. 5, lines 29-42, col. 8, lines 1-8) does not show all of the limitations of Applicants' claimed invention. Venkatraman does not disclose associating a hyper-text link with each device button by retrieving a URL from a home device, wherein the URL is maintained in a properties file associated with the home device, and associating the URL with the device button that is associated with the home device, as claimed.

Venkatraman, col. 5, lines 29-42, is directed to a system wherein Web access functionality is embedded in the device 10 to enable accessible user interface functions for the device 10 by a web browser 40. A web server 14 in the device 10 provides access to the user interface functions for that device 10 through a device web page 18. A network interface 12 in the device 10 enables access to the web page 18 (Fig. 3) by the web browser 40 such that a user of the web browser 40 accesses the user interface functions for the device 10 through the web page 18. In Fig. 3, the device is a printer that shows a home page for the printer.

Venkatraman, col. 8, lines 1-8, states that embedded web server functionality may be embedded into each washing machine of a chain of Laundromats wherein an operator from an

office computer can determine the machines that require servicing and schedule daily service routing to the Laundromats accordingly.

However, as is glaringly obvious, Venkatraman does not disclose associating a hyper-text link with each device button by retrieving a URL from a home device, wherein the URL is maintained in a properties file associated with the home device, and associating the URL with the device button that is associated with the home device, as required by Claim 16.

In fact, Venkatraman teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application." (Venkatraman, Col. 7, lines 36-38). The method of retrieving a URL from a home device is not taught by Venkatraman. Applicants' method of providing of a URL associated with the device provides increased information selectivity, not provided in Venkatraman. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 16 because the modification of the reference is improper.

As per **Claim 18**, Venkatraman, col. 7, lines 37-46, does not disclose that retrieving the URL from the home device, includes the steps of retrieving the URL from a properties file that is stored on the home device. There is no Web server query. Rather, a user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into

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the corresponding web browser application, and the URL is used to retrieve web page of the device. This has nothing to do with the claimed limitations.

As per **Claim 19** for at least the reasons stated above, the references alone or in combination, do not disclose generating the device list file by detecting that a device is connected to the home network, associating a logical device name with the home device, and storing the logical device name in the device list file, as claimed. In addition Claim 19 adds further limitations to base Claim 1, which are allowable for at least the above reasons.

Rejection of Claims 15, 17 under 35 USC §103(a)

Rejection of Claims 15, 17 under §103(a) as being unpatentable over Venkatraman and Hanson in view of Reber, is respectfully traversed because the claims include limitations not taught or suggested by the cited references alone, or in combination.

As to **Claims 15 and 17**, the rejection of these claims under 35 USC 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 9, and further in view of Reber, is respectfully traversed. Applicants also respectfully traverse the rejection and the modification and combination of Venkatraman, Hanson and Reber. Applicants incorporate herein the remarks set forth above in response to the rejection of Claim 9 that clearly illustrates the novel and unobvious aspects of the claim over the references cited. As a result of the dependence of Claims 15 and 17 from Claim 9, Applicants' respectfully assert that Claims 15 and 17 are in turn allowable.

As the Examiner also states, Venkatraman does not disclose all of the claimed

limitations. Further, it is well settled that for a modification or combination of the prior art to be

proper, the prior art itself must provide a suggestion for the asserted modification. Applicants

respectfully traverse the proposed combination and modification. Reber teaches advertising on a

first web page by displaying a logo of a sponsor that is linked to the web page of the sponsor.

Accordingly, because the user is already on the first web page, there would be no reason or

motivation for Reber to provide a logo of the first web page that links to itself. In addition,

because Venkatraman already accesses the web page of the device to download information

therefrom, there would be no reason to provide a logo to do so. Furthermore, because Hanson

teaches providing a control mechanism for a printer accessed through a URL, there would be no

reason to provide a logo for an alternate printer. Therefore, because of the diverse functioning of

the references, there would be no motivation for the combination thereof to provide a LOGO as

claimed by Applicants'.

The Examiner recognizes the advantages of the presently claimed invention by trying to

make "hind-sight" modifications to the references to achieve the claimed invention. Applicants'

LOGO provides increased device recognition, by the Examiner attempts to improperly combine

divergent references to achieve the advantages of Applicants' claimed invention. Applicants'

respectfully submit that the fact the modification produces advantages in increasing device

recognition by using a LOGO militates in favor of the patentability of Applicants' claimed

invention because it proves that the combination produces new and unexpected results and hence is unobvious.

Therefore, Applicants' respectfully request withdrawal of the rejection of Claims 15 and 17 because the combination and modification of the references is improper and does not disclose all of the claimed limitations thereof.

CONCLUSION

If the Examiner believes that telephone interview will help further the prosecution of

this case, Applicant respectfully requests that the undersigned attorney be contacted at the listed

telephone number.

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Respectfully submitted,

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